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listed in signature blocks below*

**UNITED STATE DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, JULIEANNA  
MUNIZ, ELIZA CAMBAY, SAL CATALDO,  
EMIR GOENAGA, JULIAN SANTIAGO,  
HAROLD NYANJOM, KELLIE NYANJOM,  
and SUSAN LYNN HARVEY, individually  
and on behalf of all other similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 3:20-cv-4688-RS

**STIPULATION AND  
ORDER TO RESCHEDULE MOTION  
TO DISMISS HEARING**

Judge: Hon. Richard Seeborg  
Action Filed: July 14, 2020  
Trial Date: Not Set  
Place: Courtroom 3 – 17<sup>th</sup> Floor

1 Pursuant to the Local Rules 6-2 and 7-12, Plaintiffs Anibal Rodriguez, Julieanna Muniz,  
2 Eliza Cambay, Sal Cataldo, Emir Goenaga, Julian Santiago, Harold Nyanjom, Kellie Nyanjom,  
3 and Susan Lynn Harvey (“Plaintiffs”) and Defendant Google LLC (“Google”), by and through  
4 their respective counsel, hereby stipulate and agree to the following:

5 WHEREAS, Plaintiffs filed their Amended Complaint on November 11, 2020;

6 WHEREAS, Google filed a Motion to Dismiss Plaintiffs’ Amended Complaint on  
7 December 17, 2020;

8 WHEREAS, the deadline for Plaintiffs to file any opposition to Google’s Motion to  
9 Dismiss is January 14, 2021;

10 WHEREAS, the deadline for Google to file any reply is February 4, 2021;

11 WHEREAS, on December 1, 2020, the Court set the hearing on any motion to dismiss for  
12 February 25, 2021, at 1:30 p.m.;

13 WHEREAS, counsel for Plaintiffs have a conflict on that hearing date for the following  
14 reasons;

- 15 1. Counsel for Plaintiffs represent individuals in an earlier-filed action against  
16 Google currently pending before the Hon. Lucy H. Koh. *See Brown v. Google*  
17 *LLC*, Case No. 20-cv-03664-LHK (N.D. Cal.);
- 18 2. On October 15, 2020, Google filed a Motion to Dismiss in the *Brown*  
19 litigation, noticing the Motion for a hearing before Judge Koh on February 25,  
20 2021, at 1:30 p.m. *See Brown v. Google LLC*, Case No. 20-cv-03664-LHK  
21 (N.D. Cal.) (Dkt. No. 82);

22  
23 NOW THEREFORE, the Parties stipulate and respectfully request that the Court re-set the  
24 February 25, 2021, hearing date to February 18, 2021 or March 4, 2021.

1 DATED: January 4, 2021

SUSMAN GODFREY L.L.P.

2 By: /s/ Amanda Bonn

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**ATTESTATION**

I, Amanda Bonn, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.


DATED: January 4, 2021

By: /s/ Amanda Bonn  
Amanda Bonn

**ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED that the hearing currently set for February 25, 2021, at 1:30 p.m. is hereby continued to March 4, 2021.

Date: January 4, 2021

  
Hon. Richard Seeborg  
United States District Judge